

UNITED STATES DISTRICT COURT
for the
Southern District of Texas

United States of America)
v.)
Luis Alonso SAAVEDRA-Sanchez) Case No.)
)
)
)
)
)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 17, 2019 in the county of Jim Hogg in the
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
8 USC 1324	Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

Continued on the attached sheet.

/S/Joshua Steele

Complainant's signature

Joshua Steele

Border Patrol Agent

Printed name and title

Sworn to before me and signed in my presence,

Date: December 20, 2019

Judge's signature

City and state: Laredo, Texas

Diana Song Quiroga, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Luis Alonso SAAVEDRA-Sanchez

Case Number:

1. On December 17, 2019, at approximately 9:50 p.m., a Border Patrol Agent (BPA) was working his assigned roving patrol duty on South Texas Highway (SH) 16, when he encountered a silver in color sedan.
2. BPA was traveling northbound towards the SH 16 traffic checkpoint near the Barnhardt Ranch, when he noticed a silver in color sedan traveling at a low rate of speed (10 miles per hour), and was slowing down on the side of the road. BPA notified Laredo Sector Communications (KAK-940) on the service radio to run a vehicle registration check on the vehicle. KAK-940 revealed the silver in color sedan was a 2010 Chevrolet, registered to Josue De Jesus Martinez from Mission, Texas.
3. BPA observed the vehicle and parked behind it do a welfare check on the Aveo. BPA approached the vehicle and identified himself as a United States Border Patrol Agent. BPA asked the driver, later identified as (J. D. J. M.), if everything was okay. J. D. J. M stated his vehicle had turned off and ran out of gas. BPA noticed three more passengers inside the vehicle. BPA noticed they were avoiding eye contact and appeared to be nervous and fidgeting around. J. D. J. M stated they were going to work at an unknown site. BPA conducted an immigration inspection on all the passengers. J. D. J. M stated he was a United States Citizen, the front passenger, later identified as Luis Alonso SAAVEDRA-Sanchez, stated he was a Lawful Admitted Permanent Resident (LAPR) but did not have his card with him. BPA questioned the passengers sitting on the back seat as per their citizenship. The subject behind the driver, later identified as Boris Bladimir RODRIGUEZ-Penate, stated he was a citizen of El Salvador with no documentation to enter or be in the United States legally. The subject behind the front passenger, later identified as Kevin Daniel VENTURA-Medina, stated he was a citizen of Honduras with no documentation to enter or be the United States legally. All subjects were placed under arrest and transported to the Hebronville Border Patrol Station for further processing.
4. The driver, J. D. J. M, was not questioned and released due to his juvenile status.
5. At the Hebronville Border Patrol Station, Luis Alonso SAAVEDRA-Sanchez was advised of his Miranda Warning in the Spanish language as per Form I-214, which he signed both acknowledging and waiving his rights. SAAVEDRA-Sanchez was willing to provide a sworn statement without an attorney present.
6. Principal: SAAVEDRA-Sanchez stated he was picked up around 6:00 p.m., on December 17, 2019, by his friend MARTINEZ. SAAVEDRA-Sanchez stated they went to Roma, Texas to a location where they picked up the two subjects that SAAVEDRA-Sanchez assumed were illegal aliens due to their nationality. SAAVEDRA-Sanchez stated he received a text message by a school acquaintance indicating where he was going to pick up and drop off the two subjects. SAAVEDRA-Sanchez stated he was going to get paid \$600 U. S. Dollars per person once they got picked up. SAAVEDRA-Sanchez stated they drove for about 40 minutes on the highway (SH 16) before stopping.
7. Material Witness: Kevin Daniel VENTURA-Medina provided the following sworn statement. VENTURA-Medina stated he contacted an unknown person, referred to as a "Crosser", and made arrangements to cross into the United States. VENTURA-Medina stated he was going to pay \$650 U. S. Dollars in order to get to Houston, Texas. He paid \$325 in order to get across the river and he would pay \$350 upon arriving to his destination. VENTURA-Medina stated that he entered the United States seven days ago (December 10, 2019 around 12:00 p.m.) near Roma, Texas on a small raft. VENTURA-Medina stated he stayed in a stash house upon crossing the Rio Grande River, and stayed in the house for seven days. VENTURA-Medina stated he was picked up by a dark in color Chevrolet sedan and drove for about an hour before pulling over. VENTURA-Medina identified Luis Alonso SAAVEDRA-Sanchez as the passenger of the car in a six photo lineup.
8. Material Witness: Boris Bladimir RODRIGUEZ-Penate provided the following sworn statement. RODRIGUEZ-Penate

stated that his wife friend had contacted an unknown person for arrangements to cross into the United States. RODRIGUEZ-Penate stated he was going to pay \$2,000 U. S. Dollars in order to get to Houston, Texas. He paid \$350 in order to get across the river and rest of the amount (\$1,650) upon arriving to his destination. RODRIGUEZ-Penate stated that the unknown people his wife had made arrangements with had crossed him three days ago (December 14, 2019 at around 6:00 p.m.) near Roma, Texas on a small raft. RODRIGUEZ-Penate stated he stayed in a stash house upon crossing the Rio Grande River, and stayed for about a day. RODRIGUEZ-Penate stated he was picked up by a dark in color Chevrolet sedan and drove for about an hour before pulling over. RODRIGUEZ-Penate identified Luis Alonso SAAVEDRA-Sanchez as the passenger of the car in a six photo lineup.

SUBSCRIBED and SWORN to before me on

20th day of December, 2019

Signature of Judicial Officer

/S/ Steele, Joshua Border Patrol Agent

Signature of Complainant